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8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 APPROXIMATELY \$24,000.00 IN  
U.S. CURRENCY,  
15 Defendant.  
16

2:21-MC-00041-WBS-KJN

STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

17 It is hereby stipulated by and between the United States of America and potential claimant  
18 Bradley Hoderny (“claimant”), by and through their respective counsel, as follows:

19 1. On or about November 23, 2020, claimant filed a claim in the administrative forfeiture  
20 proceeding with the United States Postal Inspection Service (“USPIS”) with respect to the Approximately  
21 \$24,000.00 in U.S. Currency (hereafter “defendant currency”), which was seized on September 1, 2020.

22 2. The USPIS has sent the written notice of intent to forfeit required by 18 U.S.C. §  
23 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the  
24 defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a  
25 claim to the defendant currency as required by law in the administrative forfeiture proceeding.

26 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
27 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
28 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative

1 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the  
2 parties. That deadline was February 19, 2021.

3 4. By Stipulation and Order filed February 16, 2021, the parties stipulated to extend to April  
4 20, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
5 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
6 forfeiture.

7 5. By Stipulation and Order filed April 16, 2021, the parties stipulated to extend to June 18,  
8 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
9 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
10 forfeiture.

11 6. By Stipulation and Order filed June 14, 2021, the parties stipulated to extend to August  
12 17, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
13 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
14 forfeiture.

15 7. By Stipulation and Order filed August 16, 2021, the parties stipulated to extend to October  
16 15, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
17 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
18 forfeiture.

19 8. By Stipulation and Order filed October 15, 2021, the parties stipulated to extend to  
20 November 15, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
21 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
22 subject to forfeiture.

23 9. By Stipulation and Order filed November 12, 2021, the parties stipulated to extend to  
24 December 15, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
25 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
26 subject to forfeiture.

27 10. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to  
28 January 14, 2022, the time in which the United States is required to file a civil complaint for forfeiture

1 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
2 subject to forfeiture.

3 11. Accordingly, the parties agree that the deadline by which the United States shall be  
4 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment  
5 alleging that the defendant currency is subject to forfeiture shall be extended to January 14, 2022.

6 Dated: 12/15/22

PHILLIP A. TALBERT  
Acting United States Attorney


7  
8 By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant United States Attorney

9  
10 Dated: 12/15/22

/s/ Isaac Safier  
ISAAC SAFIER  
Attorney for potential claimant  
Bradley Hoderny  
(Signature authorized by email)

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15 **IT IS SO ORDERED.**

16 Dated: December 17, 2021

  
WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE